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The unparallel'd
F O R G E R I E S

and wicked
P R A C T I S E S

O F

John Morris, Leonard Darby, John Harris, and Isabel Smyth:

VVhereby they have set on foot a
false Title for M O R R I S,

A N D

Endeavoured to destroy the just Title
of Sir A D A M L I T T L E T O N
Deceased, and others, to a very considerable
Estate in E S S E X and L O N D O N.

Published for the vindication of the truth, and for the satisfaction of all those that have been, or may be cheated of their money, or otherwise drawne in to countenance and uphold these notorious Forgeries.



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CHARTER OF





The unparalleld *Forgeries* and wicked practises of *John Morris*, *Leonard Darby*, *John Harris*, and *Isabel Smyth*.

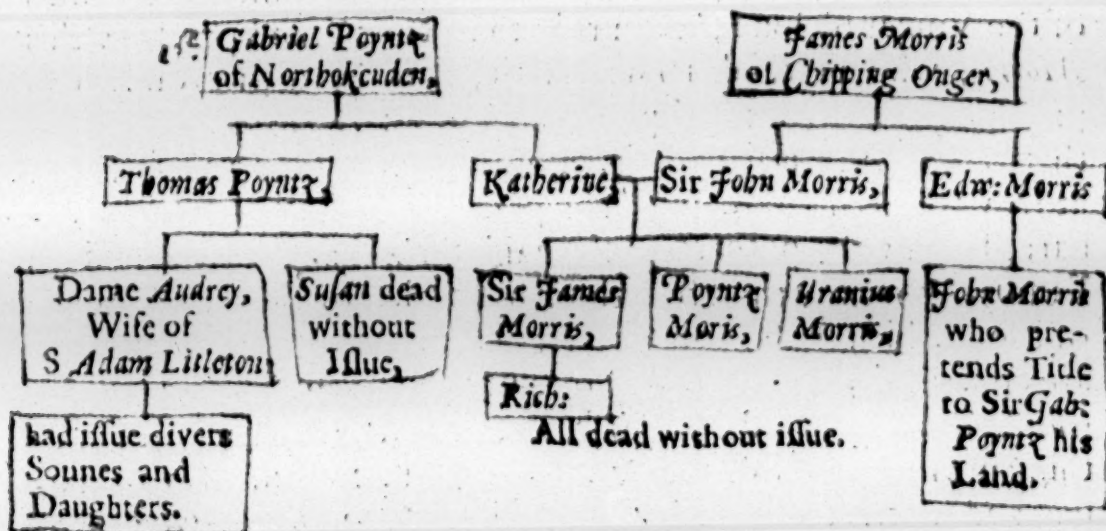


Hereas divers false and scandalous Papers have been printed and spread abroad by the diligent practise and combination of divers lewd and infamous Persons, viz: *John Morris*, *Mary* his Wife, *Isabel Smyth*, *Leonard Darby*, and *John Harris*; who, to scandalize the just Title of *Sir Adam Littleton* Baronett, deceased, to certaine Manours and Lands in the County of *Essex*, and City of *London*, (which did of right descend and come unto *Dame Audrey* his late Wife as her undoubted Inheritance from her Ancestors) and with an intent to Dis-inherite her and her right Heyres, have in order thereunto set up a forged Title for *John Morris* one of the Confederates before named; In prosecution of which designe, these Confederates have not beene wanting falsly to insinuate into the minds of the Vulgar by loud clamours both by tongue and pen, how this *Morris*, who pretends to have Title, hath been grievously oppressed by the power and prevalency of *Sir Adam Littleton*; And that *Morris* for his part desires nothing more than a faire Tryall at Law for his interest, which he pretends he hath ever been debarred of by the potency of the said *Sir Adam Littleton*, and his Family. It is now therefore thought fit (lest by silence the minds of those which shall happen to read, or heare such discourses as are contrived and sent abroad on purpose to abuse their believe, should be ingaged with prejudice in this matter) to publish something in vindication of the Persons and Cause from such calumnies and detractions as these notorious Impostors have endeavoured to asperse them withall, and so much the rather, that over-

credulous Persons may not be hereafter seduced to ingage their money or travell in promoting of so wicked and hopelesse a designe ; a businesse wherein divers Citizens and others by the practise of these lewd Persons (who have no other way of livelyhood) have been drawne in to make adventures, though to the unrecoverable losse of their stocks : Therefore it will not be amisse to set downe,

1. *From whom the Inheritance descended.*
2. *The Pedegree of the Lady Littleton, and of this Morris.*
3. *Her Title to the premises, both by descent, and by conveyance.*
4. *The pretended Title of the said John Morris.*
5. *The many unparalleld forgeries that have been committed to make and maintaine that pretended Title, with the punishment inflicted upon the Malefactors, and their incessant practises and attempts, since that time both by fraud and force to gaine the Possession.*

The Lands in question between the Lady Littleton and this John Morris were (as both sides acknowledge) formerly the Inheritance of Sir Gabriel Poyntz, under whom both Parties claime : To which this Morris pretends that (by foure Offices) he is found Heyre at Law ; but whether he be so, or no, will best appeare by the Pedegree here truely set downe.



Here you see that Dame *Andrey* (Wife of Sir *Adam Littleton*) is the sole surviving Daughter of *Thomas Poyntz* the onely Son of Sir *Gabriel*; and so is his undoubted Heyre at Common-Law. And is intit'led also by conveyance, viz.

Sir *Gabriel Poyntz* in Hillary Terme, 2 *Jacob*: levied two Fines of all his Lands in *Essex* and *London* to *Richard Cutts*, and *William Cutts*: And by Indent. dated 2. *Jany*: 2 *Jacob*: declared these Fines to be to the use of himselfe and the Heyres Males of his body; and for default of such Issue, then to *Richard Cutts* and *William Cutts*, for six yeares; Then to Sir *John Morris* (who married *Katharine* Daughter of Sir *Gabriel*) for twenty yeares; then to Sir *James*, (eldest Sonne of the said *John* and *Katharine*) and the Heyres Males of his body; the remainder to *Poyntz Morris*, (the second Sonne) and the Heyres Males of his body; the remainder to *Uranus*, (the third Sonne) and the Heyres Males of his body; The remainder to *Andrey* the Daughter of *Thomas Poyntz*, and the Heyres Males of her body, with divers remainders over in Tayle; the remainder in Fee to the right Heyres of Sir *Gabriel*.

All the yeares are expired, and Sir *James*, *Poyntz*, and *Uranus*, are all dead without Issue; and so the Estate is come to the Lady *Littleton* by speciall limitation in this conveyance: and according to this settlement hath the Estate ever since for above these forty yeares been claimed and enjoyed. And in all Suites concerning this Estate this Title (and no other) hath been alwaies pleaded and set forth, as you may see by severall Informations and Answers, Orders and Decrees, in the Court of Wards, about 8 *Jacob*: And these Fines and Deed of uses found at large in three severall Offices: One after the death of Sir *Gabriel*. Another, after the death of Sir *James*. And a third, after the death of *Poyntz Morris*.

Next then for *Morris* his pretended Title, You see by the Pedegree that he hath no relation either of name, blood, kindred, or allyance to Sir *Gabriel Poyntz*, and so hath no colour of Title as Heyre at Law, unlesse he will say he is the Sonne or Grand-child of Sir *Gabriel Poyntz*, which he may as well doe as call himselfe by the name of *Poyntz*, as if he were his Sonne. Therefore if he have any Title, it must be by conveyance, which (as it is set

forth in his printed Bookes) is thus, viz: Upon a Contract of marriage between John Morris the Sonne of James Morris, and Katharine the Daughter of Sir Gabriel Poyntz, conveyances were made to settle the Estates of the two Fathers upon the said John and Katharine for life, and their Heyres Males of their two bodies for life ; and in case of such default, then upon Edward (second Sonne of the said James Morris) for life, and the Heyres Males of his body for life ; and in case of such default, then upon the right Heyres Males of the body of the said James Morris for ever. And that the Estate was thus really settled (he saith) there are these cleare evidences, viz:

1. Three Fines levied at S. Albans, 37 Eliz.
2. A Plea in the Exchequer, 38 Eliz.
3. A Patent under the Great Seale, 2 Aug. 38 Eliz.
4. An Indent. dated 1 March, 38 Eliz.
5. An Act of Parliament to confirme all this, in 43 Eliz.
6. Foure Offices, two in London, and two in Essex.

All which (besides the Offices which are not materiall) will clearly appeare to be the grossest and boldest forgeries that any Age did ever yet produce, and that by such undeniable and convincing proofes as cannot be gain-said, being for the most part matters of Record, viz:

First, for their three Fines levied at S. Albans, 37 Eliz: there are none such to be found upon Record ; and it is impossible there should be any, for the Terme was then held at *Westm*: and not at S. Albans, as all the Records of that whole Term do testifie.

2. All these Fines are said to be levied by Gabriel Poyntz to James Morris, and John his Sonne (whereof one Fine is for the Manour of Chipping-Onger) now Gab: Poyntz was never Owner of that Manour: and it is very improbable he should levie a Fine of it to James Morris who was the Owner of it before.

3. The Lands at Bevis Markes in London, which Gab: Poyntz is said to passe away by one of these Fines, were not his at that time ; but were purchased by him two yeares after of the Countesse of Southampton, viz: 14 Octob. 39 Eliz: as appeares by the Deed of Purchase inrolled.

4. So also was a good part of the Lands in Essex bought divers yeares after: some in 39 Eliz: and some in 2 Jacob: as appeares by the Deeds and Fines upon Record.

Secondly,

Secondly, the *Plea in the Exchequer*, and *Patent under the Great Seale*, 38 *Eliz.* must of necessity be forged and counterfeit, because they make mention, and have reference to these forged Fines; and upon search there is no such *Plea* or *Patent* to be found upon Record in the *Exchequer*, either in *Trinity Terme*, 38 *Eliz. rot. 21.* (the time of their pretended Date) or any other *Terme* or *Roll* before, or after.

Thirdly, the *Indenture* dated 1 *March*, 38 *Eliz.* (declaring the uses of these Fines) is evident to be forged also by these particulars:

1. *James Morris*, and *Gabriel Poyntz*, did (if this were a true Deed) passe away all their Lands in present, and left themselves no Estate in any part of it, not so much as for a day, but thrust themselves immediately out of all, which no man can imagine they would doe.

2. It is very unlike they would accept of 1000 l. in lieu of all their whole Estate; and that this 1000 l. should be a farre better preferment to them and their Heyres than all their Lands, worth (as *Morris* saith) 2000 l. *per annum*: (for so the Deed runnes.)

3. *Gabriel Poyntz* gave with his Daughter *Katharine* in marriage with Sir *John Morris* 1200 l. for payment of which, he ingaged with him his onely Sonne *Thomas*; and it is very unlike that he should make his owne Daughter a Joynture of all his owne Lands, especially having given her such a Portion before.

4. Sir *Gabriel Poyntz* did not onely Dis-inherite himselfe, but his onely Sonne *Thomas Poyntz* also, whom he entirely loved, and was then living, and thus ingaged with him; and was married within two dayes after this supposed Deed was made to Dis-inherite him: the Deed is dated 1 *March*, 38 *Eliz.* and he was married 3 of the same *March* to *Jane* the Daughter and Heyre of the Lord chief Baron *Periam*: as you may see Registred in the Chnrch booke at *Chelsey*.

5. This *Jane* had a Joynture made after all this of a good part of this Estate, which could not be good if the Estate had been so settled before, as is pretended; and this Joynture shee enjoyed quietly (almost fifty yeares) all her life time, till 23 *March*, 1645. that she died.

6. *Bevis*

6. *Bevis Markes* in *London*, and divers Lands in *Essex*, expressly named to passe by this Deed, 1 *March*, 38 *Eliz.*: were not purchased by Sir *Gab: Poyntz* till a good time after, as is before-mentioned: And one whole Manour, viz: the Manour of *South-Okenden* worth 1000 l. per annum at least, which is also settled by this Deed, was never the Inheritance of *James Morris*, or Sir *Gabriel Poyntz*; but was then, and is, at this day, the Inheritance of other men.

7. Sir *Gabriel Poyntz* long after this injoyed and disposed of all his Lands as the absolute Owner, and settled his Estate by other reall Fines in *Hillary Terme*, 2 *Jacob.* and by a Deed of Uses, dated 2 *Jan.* 2 *Jacob.* as is before-mentioned; whereby the Estate is clearly settled upon, and come to the Lady *Littleton*, and her Heyres.

Fourthly, the Act of Parliament supposed to be made, 43 *Eliz.* to confirme that pretended conveyance, whereby *Morris* maketh his Title, will also appeare to be as grosse as any of the rest. For,

1. There being no such Fines levied at *S. Albans*, 37 *Eliz.* nor Deed dated 1 *March*, 38 *Eliz.* (as is before made evident) which this Act was made to confirme: It is impossible there should be an Act to confirme that which never was.

2. The Lord chiefe Baron *Periam* the Father of *Jane* the Wife of *Thomas*, sate in the Lords House that Parliament, 43 *Eliz.* And is it probable that he would suffer any such thing to passe whereby to Dis-inherite his Daughter, and all her posterity?

3. Every Act that passeth is before the finall passing thereof upon severall occasions entred and recorded at least seven or eight times in the Journall Bookes of both Houses; and there is not the least mention of this Act in any of all the Journal Books, Kallenders, or Rolls of Parliament in either House: and this Act (if any were) must have been among the private Acts, of which sort there were onely ten made that Parliament, amongst which, their pretended Act is not found. All these ten Master *Browne* (Clerke of the Parliament) can produce, and give a good account of: And the Title of this Act (if there were any) would be printed as well as the Titles of all the other private Acts.

4. Whereas they alledge, that one Mr. *Hunt* an under Clerke of

of the House of Commons procured for them the Copie of this pretended Act with Master *Brownes* hand to it : M. *Hunt* being examined to this at the Lords Barre, did then, and will still upon his Oath deny it.

5. Master *Browne*, lest his hand should at any time be counterfeited, hath constantly taken this sure course never to Signe any thing but what one of his owne Clerkes write, as his Clerks did all testifie upon Oath at the Lords Barre ; And that this Copie was none of their hand-writing.

6. The very frame of this Act, if there were nothing else, were sufficient to convince any rationall man that it is a Forgery, and that no such thing did ever passe both Houses where every sentence and word are strictly scanned ; and things never use to be offered there but upon good advice and mature deliberation ; whereas this Act is full of nonsense and absurdities, viz: In all other private Acts there is a *Saving of the rights of all Strangers*, but in this they are expressely barred and destroyed ; and a ~~part~~ of nonsense in reciting the *Stat' of Uses*, and mention of a *Marriage betweene three Men and no Woman*, &c.

As for their *four* Offices, two in London and two in Essex, and their *Injunctions for possession* : It is true, they had two Offices (such as they be) found at *Guild-hall*, but without any manner of materiall evidence ; and these Offices are so repugnant one to the other, [that they are evidently contradictory and inconsistent, For in the one it is found, that *Poyntz Morris is Uncle to Richard* ; And in the other, that *Richard is Uncle to Poyntz*, which is impossible for both to be true ; neither was their *Injunction absolute*, but onely conditionall, viz: *If cause to the contrary Were not shewne to the Court at a certaine day* ; at which day cause was shewed, and the *Injunction suspended* : And the Court of Wards being truly informed of the fowle carriage at the finding of the said Offices, did Order the *Escheators and Feodary to certifie the whole proceedings to the Court* ; but before any Certificate was returned, the Court was dissolved by Ordinance of Parliament.

And as for their two Offices in Essex, those nothing at all concerned the Estate of Sir *Gabriel Poyntz* : but however they were afterwards overthrowe by *Travers* in the Kings Bench, by those that were concerned therein. And at *Stratford-Langthorne*,

15. Aug. 21 Car. (a time and place of *Morris* his owne appointing, where he had his Councell and Witnesses ready) an Office was found against him, and for the Lady *Littleton* concerning the Lands of Sir *Gabriel Poynts*.

As for those things which they call *Other originall Records* pretended to be found in the *Court of Wards*, and the *Tower*, (as if there could be two Originals of one thing:) They are no other then the very same forged Fines, Plea, and Act of Parliament before-mentioned, which being already fully proved to be Forgeries, will need no further Answer.

That pretended *Record in the Tower* is the same in substance with that *Plea in the Court of Wards*, and both of the same date, viz: *Trin. 38 Eliz: rot. 21.* but for the forme and words much differing, so that they prove each other to be Forgeries; for there can be but one reall Record, which (if any be) is in the *Exchequer*. And these two pretended Copies or Transcripts thus differing from one another cannot possibly both be true; the truth is, they are both false, there being indeed no Record at all, neither is there any Records of this nature, or of so late time in the *Tower*, it being well knowne that no Records since the time of *Edw. 4.* which is 112 yeares agoe are there to be found.

Divers other particulars there are (for brevity sake omitted) further to discover what notorious grosse Forgeries these are, whereby *Morris* and his Confederates make their Title.

The next thing in order to be spoken to, is, the *Sentence pronounced against them by the House of Peeres* which *Morris* and his Complices so much exclaime against, as being unjust and tyrannicall: And therefore we will give some Relation how the Cause came before the Lords, who were the onely proper Judges in this businesse, being either to acquit, or condemne Master *Browne Cler.* Parliament. an Officer of that House, and highly intrusted with keeping the Records of Parliament, whom *Morris* and his Party had falsly accused for imbezilling the pretended *Record of their forged Copie*; and so the onely Question was, whether any such *Act of Parliament*, or no? which being a Record of that Court, it was proper onely for that Court to judge of.

But besides all this, *Morris* himselfe first petitioned their Lordships against Sir *Adam Littleton* and Master *Browne*, and voluntarily

tarily put himselfe upon the Lords for his Judges, and made it his prayer in his Petition, *that they would examine the businesse, and punish the Offenders.* And Sir Adam Littleton and Master Browne in their Answers joyned with him in his owne desires.

Whereupon, *Morris* and his Party having nine Lawyers assigned of Councell with them (being such, and so many as they desired) and nothing denied that might prepare them for a hearing, having Warrants for Witnesses, and all other Orders freely offered them by *M. Browne* without any Fee, the more to expedite their businesse : The Lords after severall hearings of Councell, and Witnesses on both sides, being fully satisfied by evident and cleer Proofs as well of the *innocency* of Master Browne, as of the *guilt and heynousnesse* of the offences of *Morris* and his Party, did (according to justice) passe Sentence against them, *To pay severall Fines, to be bound to the good behaviour, to be committed to Prison, to be incapable ever to be Witnesses in any Cause whatsoever. Acquitted M. Browne from all their odious and scandalous aspersions. Decreed their Forgeries to be damned and cancelled, and never to be produced in evidence : And ordered this Sentence to be read and published in the face of the County of Essex at the then next Assizes, there where these Forgeries were first brought to light, and produced in evidence by them at a Triall for the Title of the Lands. And also ordered the Parties to bring in the exemplification of their forged Act under a Counterfeit Great Seale, which their owne Witnesses proved to be in their hands, (though they deny it) which Seale Isabel Smyth since confessed she tooke from the exemplification of a true Act of Parliament ; which Act concernes onely the Manours of Little Munden in Hertfordshire, and hath no relation at all to this businesse, but was onely procured to be exemplified under the Great Seale, (at no lesse then 15 or 16l. charge) and for no other end but to be a Rule and patterne for them the more artificially to exemplifie their owne forged Act by, and with more dexterity & lesse danger as they supposed to translate that Seale to the exemplification of their owne forged Act.*

Both which Exemplifications they were ordered to bring in, which they refuse to doe, in regard the producing of them will notoriously manifest the truth of the premises.

Since which, they have invented false surmises against Ma-

ster Browne, that one Godfrey Cade (then a Prisoner in the Fleet) should say, That Master Browne hired him for 25 s. in hand, and promised him 5 l. more, and his Inlargement out of Prison to swear at the Lords Barre, That he himselfe had forged this Act, and counterfeited Master Brownes hand to it: which falshood this Cade hath under his hand in the presence of divers Witnesses utterly disavowed.

And in regard the Malefactors did still persist to make grievous clamours against the Sentence, and cease not falsely and maliciously to lay heavie and scandalous imputations upon Master Browne; he was at last justly provoked for the vindication of his credit and innocency, and to stop their mouthes to commence an Action at Common Law against Morris, &c. for their scandalous words against him [That he had imbezilled the Record.] And thereupon recovered 5000 l. in Damage against them towards the repaire of his reputation.

And now being utterly disarmed of their fraudulent weapons, they have since the Sentence by severall outrageous practises and forcible attempts endeavoured to gaine Possession of the Lands.

And first, their designe was, to possesse divers Officers and Souldiers of the Army of the injustice of their sufferings, and justnesse of their Cause, and to stirre them up to be active in their vindication; who being informed of the truth of the businesse, utterly refused to give any countenance to such lewd enterprises, but left them to their remedy (if they had any cause) at Law.

But yet notwithstanding, these restless Wretches (finding their designe frustrated) by combination with divers lewd and desperate Persons, such as had been cashiered the Army, and others who were fit to put any wickednesse in execution, have made severall Attempts to gaine the possession of the Lands by force:

And to that end upon 30 Decemb. last, with a Party of above twenty Troupers armed with Swords and Pistols; pretending themselves Souldiers, did, in the dead time of the Night (with great force and violence) breake open the Dores of the chiefe Mansion-house at Northokenden in Essex, (where the Sonnes of Sir Adam Littleton now live) fired their Pistols, and drew their Swords upon the Servants there, thrust them out of dores, carried them away Prisoners, and barbarously abused them; rifled the
House

Houſe, and tooke away divers Goods; and left about halfe a ſcore of their Party to keep poſſeſſion; who held the ſame by force, untill (upon complaint to the Juſtices of peace) they were by due courſe of Law removed, and committed to *Colcheſter Gaole* :

This Night alſo the ſame Party Quartered at *Barkin*, not farre off, and forced the Inhabitants to contribute Money to them :

And (which is to be obſerved) neere this place divers Robberies on the High-way were that night committed; & falſe Beards found in the room at *Barkin* where this Party ſupped; & falſe Hair and Diſguiſes taken with them that kept the poſſeſſion at *North-okenden*, which gives a juſt ſuſpition that thoſe men committed the Robberies.

Befides, ſeverall forcible attempts have been alſo made upon the poſſeſſion of the Tenants in *London*.

And ſince all this, their deſigne of forcing the poſſeſſion is ſtill proſecuted, and divers Souldiers amongſt others have been inveagled by the ſubtilty and inſinuation of one *Thompson* (who led the Rout to commit the former outrages, and who is a Perſon that ſtands condemned to die by a Councell of Warre) to ingage in the buſineſſe; who accordingly came to the Houſe in *Effex* and attempted to force the poſſeſſion, but were apprehended and ſubdued by the Countrey.

And *hue and crie* being raiſed to apprehend *Thompson*, and them that eſcaped; *Thompson* ſet upon them that made purſuite, and afterwards had the boldneſſe to procure a Warrant to apprehend the Conſtable and thoſe that purſued him.

It were endleſſe to mention all the waies and practiſes theſe unwearied Spirits have attempted in this buſineſſe; enough hath been ſaid (though much more might be truly added) to make it appeare that the Forgeries before mentioned were the boldeſt and groſſeſt that ever were ſet on foot or excogitated in any Age, and their proceedings and attempts managed with that height of inſolency and defiance of the Lawes as never any Story yet parallel'd.

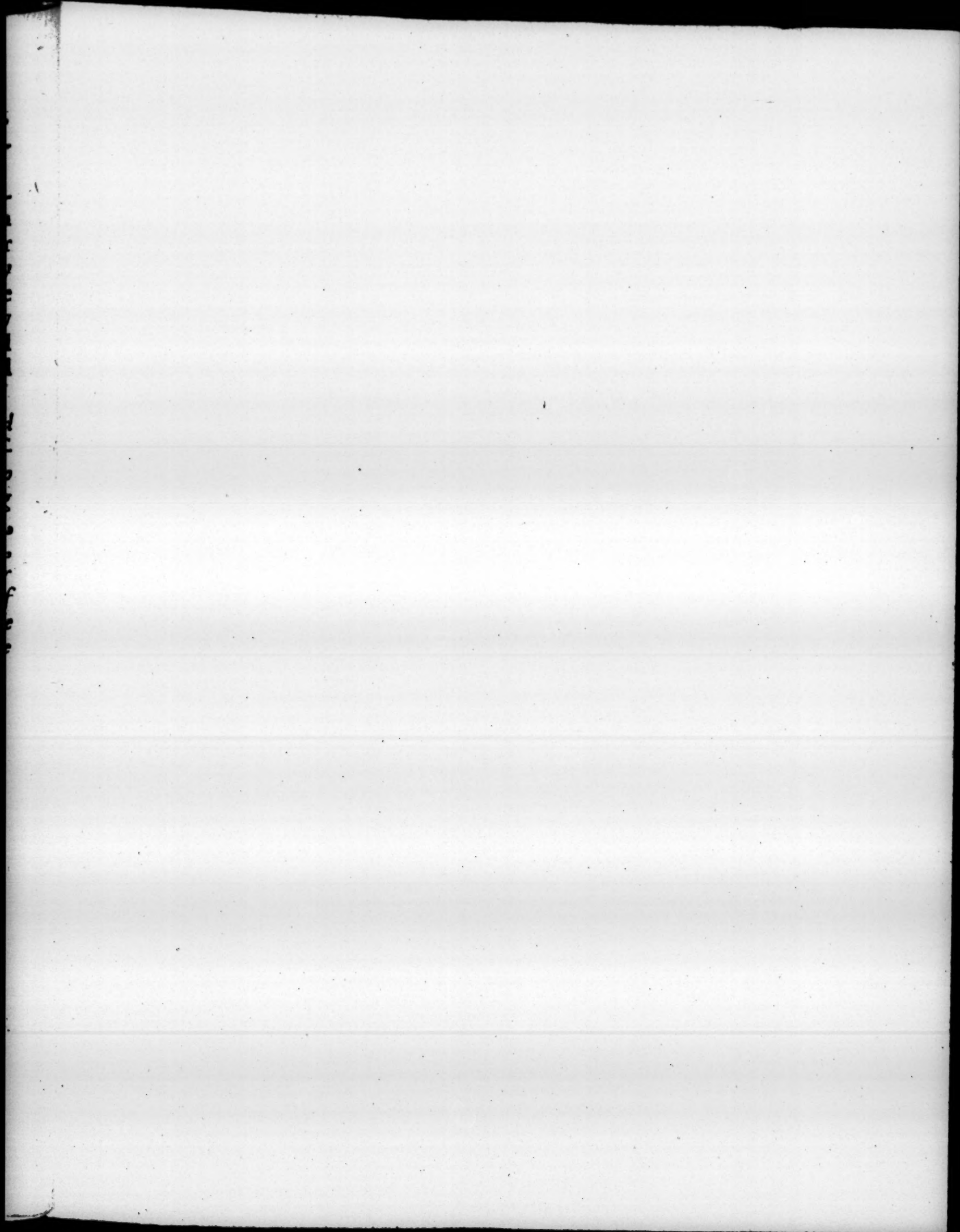
Neither is the cheat which they put upon ſundry Perſons, leſſe

to be admired considering the basenesse and meanesse of the Estate and condition of *Morris* and his Confederates, and the notoriousnesse of their guilt in this matter.

And because they still continue to outface the truth, It is desired that ail that are ingaged in the businesse, and especially such as may be in danger of being drawne in to be cheated of their money (as too too many have already been) would diligently search into the truth of all these things. And whether there be any such Records indeed as *Morris* pretends, whereby they may receive an infallible assurance not onely of the just Right and Title of the Lady *Littleton*, but also of the accursed Forgeries and practises of *Morris* and his Confederates to defeat the same.

The reason why something of this nature hath not beene published before this time, is, because Morris, and his Confederates might possibly (before they had printed their forged Title) be so impudent as to deny that ever they claimed by any of these Forgeries, and so (seeing their grosse errors and mistakes) might forge some other new Title, which should not be so easily contradicted, nor so full of absurdities, and impossibilities, as this is from which they cannot now recede or vary, but will most notoriously give themselves the Lie; neither (if they should now start some new Forgery) could they hope that People would be thereby cozened and cheated of their money, as they have beene by the former.

F I N I S.



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